## REMARKS

Applicant has enclosed a new abstract as required by the examiner.

The examiner rejected Claims 1-4, 6-15, 17-23, 25-30 and 32 under 35 U.S.C. 103(a) as being unpatentable over "The Angelic Beat Haiku Machine", Zasa, over Minkler, U.S. Patent 4,712,174, and also over the Microsoft Windows NT 4.0 Operating System (Gavron).

Applicant's claims are distinct over the references. Claim 1 is directed to a method of generating a computer-implemented poetry screen saver. The method includes loading an author analysis model, randomly selecting a seed word from the author analysis model, completing a poem based on the seed word and displaying the poem, as a screen saver, on an output device.

The applied art is not understood to disclose or suggest the foregoing features of claim 1. In particular, neither Zasa nor Gavron or Minkler discloses or suggests in combination loading an author analysis model and completing a poem based on the seed word.

Applicant challenges the efficiency of the Zasa reference as being an enabling disclosure. Assuming for argument sake that Zasa is enabling, which Applicant does not concede, nowhere does Zasa teach loading of an author analysis model. Specifically, Zasa describes a template, a weighting of a universe of words and randomly filling-in the template based on the weights of the universe of words. The examiner quotes Zasa where Zasa states:

> My role was to provide raw materials that I felt might produce interesting results. So I built the templates, which were more complicated to design that you might think, and mindfully populated (and weighted) the universe of words that the computer draws from.

> I chose the "Beat" theme because I thought the results might resemble Jack Kerouac's stream-of-consciousness poetry (in a funny way they almost do), and because I like Kerouac's formulation for the American Haiku: don't count syllables, just write a short, vivid, three-line poem (also, building a generator that made strict 17-syllable haiku would have been considerably more difficult.) I tried to skew the database to give the haiku a "Beat" flavor by stressing the words that the Beat Poets favored – night, road, angel, eternity, tea, etc.

However, nowhere, in that section or the short four paragraphs that make-up Zasa, does he disclose or suggest loading of an author analysis model. Zasa rather, is hard codes a universe of words to generate a poem based on the "Beat theme" specifically "So I built the templates, which were more complicated to design that you might think, and mindfully populated (and weighted) the universe of words that the computer draws from." However, this is not loading of an author analysis model.

Further, in applicant's system, an author analysis model is use for generating a poem based on a seed word. Zasa describes generating each word randomly based on weights. To this point the Examiner, in his previous office action, states that:

The examiner admits that Zasa does not "explicitly teach randomly selecting a seed word" and contends that Zasa suggests that the Angelic Beat Haiku machine generates haikus by randomly selecting words from the above-described universe of words, whereby these selected words are place into a template. (See page 4 of the Office Action). Therefore, the Examiner should likewise agree that Zasa does not disclose or suggest completing a poem based on a seed word. Furthermore, Gavron does not disclose or suggest "completing a poem based on the seed word." Gavron describes an operating system but does she not describe poetry generation. Therefore, Gavron does not disclose or suggest completing a poem based on a seed word. The examiner relies on Minkler to disclose randomly selecting a seed word and cites Col. 2 lines1-31.

However, Minkler does not teach a seed word. Rather Minkler discusses

It is therefore, an object of the invention to provide a pseudorandom computer printout of text in response to a plurality of input data items related to the intended recipient and/or sender of that text.

It is another object of the invention to provide a pseudorandom computer printout of poetry in response to a plurality of input data items related to the intended recipient and/or sender of the poetry.

It is still another object of the invention to personalize a computer generated pseudorandom text output by means of an algorithm which selects sections of text which are related to the personal identification, residence and personality traits of the intended recipient.

Applicant : Kurzweil, et al.                              Attorney's Docket No.: 11327-008001
Serial No. : 09/703,828
Filed     : November 1, 2000
Page     : 12 of 14

It is yet another object of the invention to compile pseudorandom poetry under the control of a computer, such poetry being related to identity and at least one personality trait of the intended recipient and such poetry being selected to accommodate the gender of the intended recipient and variations in the number of syllables in the name of the recipient.

It is a still further object of the invention to provide a pseudorandom computer printout of text which is related to the identity, gender, message or occasion, and at least one personality trait of an intended recipient of that text, whereupon, when a limited number of successive commands are given to the computer to produce such text, a new combination of text is produced even when the input data provided are the same..

Even if Zasa and Gavron were combined with Minkler, none of the features of the hypothetical combination discloses or suggests completing a poem based on the seed word. Moreover, such a combination is not suggested since Minkler: "selects sections of text which are related to the personal identification, residence and personality traits of the intended recipient." It would not be suggested to combine these teachings because Minkler does not address or use an author analysis model. In summary, the hypothetical combination neither discloses nor suggests at least loading an author analysis model, randomly selecting a seed word from the author analysis model and completing a poem based on the seed word using the author analysis model.

Claim 13 includes analyzing at least one pre-existing composition to generate linked data structures and generating a new composition from the data structures by using the data structures to locate a user input word in the linked data structure and determine words based on the user input word that follow the user input word in the linked data structure. Furthermore, claim 14 further defines the linked data structures to include 1-grams, bigrams, trigrams, and quadrigrams.

In another instance, claim 15 adds the element of automatically composing words of text while examining weights represented in the linked data structures to avoid counts of words in the linked data structure that would tend to repeat identical words from pre-existing compositions given a start word in an analyzed composition to avoid plagiarism.

For at least the foregoing reasons, Applicants request withdrawal of the art rejection.

The examiner rejected Claims 5, 16, 24 and 31 are rejected under 35 U.S.C. 103(a) as being unpatentable over the combination of Zasa, Minkler and Gavron, and also over U.S. Patent 6,091,411, Straub et al.

These claims are allowable with their respective base claims. Further, Claim 5 adds the element of selecting an interface that includes a screen saver interface option to open a dialogue box having an option to provide a link to a dialogue box having information on upgrading. This feature is not disclosed by the combination of references.

For at least the foregoing reasons, Applicants request withdrawal of the art rejection.

In view of the foregoing amendments and remarks, Applicants submit that the entire application is now in condition for allowance. Such action is respectfully requested at the Examiner's earliest convenience.
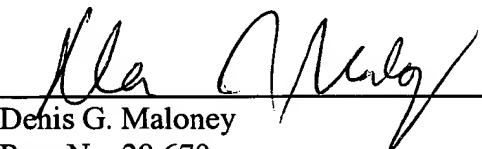
All correspondence should be directed to the below address. Applicants' attorney can be reached by telephone at the number shown below.

Enclosed is a $490.00 check for the Three Month Petition for Extension of Time fee. Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

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